



SHASTA COUNTY

DEPARTMENT OF AGRICULTURE/WEIGHTS & MEASURES

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MARY PFEIFFER
Agricultural Commissioner
Sealer of Weights & Measures

July 28, 2003

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Public Information and Records Integrity Branch
Office of Pesticide Programs
Environmental Protection Agency (7502C)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Attention: Docket ID Number OPP-2003-0204

The United States Environmental Protection Agency (USEPA) issued a Federal Register Notice announcing the availability and opportunity for public comment on the notice "Zinc Phosphide: Notice of Filing a Pesticide Petition to Establish a Tolerance." The notice was issued on July 9, 2003, with a 30-day public comment period ending August 8, 2003.

As both the Chairman of the California Association of Agricultural Commissioners and Sealers Association's (CACASA) Weed and Vertebrate Committee and as the Shasta County Agricultural Commissioner I would like to express support for the establishment of a federal food tolerance for the use of zinc phosphide on alfalfa. Alfalfa hay is a major crop for the dairy and cattle, as well as other livestock industries. In 2002 over 7.3 million tons of alfalfa hay, worth over \$873 million, was grown on more than one million acres of California farmland.

Meadow voles are a serious pest of alfalfa, frequently causing significant crop loss. During 2001 and 2002 alfalfa growers had reported yield reductions as high as 40% with a 10% decline in crop quality. Even a small reduction in yield or quality can significantly impact the value of this commodity and can also increase costs for the dairy and livestock industries.

In 1998 and 2002 the California Department of Food and Agriculture (CDFA) requested and received a Section 18 Emergency Exemption for the use of zinc phosphide on alfalfa to control the meadow voles. Since then the CDFA has conducted food safety, efficacy, and wildlife safety studies to document the safe and effective use of zinc phosphide to control meadow voles in alfalfa. Most recently a FIFRA Section 24(c) Special Local Need Registration for this use has been submitted to the California Department of Pesticide Regulation (CDPR). All required documents and data has been submitted, but the CDPR cannot issue this critical registration without the establishment of a federal food tolerance. Without the registration of this material, alfalfa growers will not have a viable means to control this economically devastating pest, making the establishment of a federal food tolerance vital. We support the establishment of this tolerance.

Sincerely,

MARY PFEIFFER, Chairman
Weed and Vertebrate Committee Chair, CACASA

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